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7 *Co-Lead/Liaison Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products  
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 **MOTION TO FILE UNDER SEAL**

13  
14 Plaintiffs' Co-Lead Counsel and the PEC respectfully move this Court, pursuant to  
15 Federal Rule of Civil Procedure 26(c)(1)(G) and Local Civil Rule 5.6 for leave to file  
16 under seal their Recommendation in accordance with this Court's sealed minute entry  
17 (Doc. 21432).

18 RESPECTFULLY SUBMITTED this 6th day of February 2020.

19 BEUS GILBERT MCGRODER PLLC

20 By: /s/ Mark S. O'Connor

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27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of February 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine